

COVINGTON & BURLING LLP

620 EIGHTH AVENUE
NEW YORK, NY 10018
TEL 212.841.1000
FAX 212.841.1010
WWW.COV.COM

NEW YORK
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August 8, 2007

BY ELECTRONIC MAIL

Dan Jackson, Esq.
KEKER & VAN NEST LLP
710 Sansome Street
San Francisco, CA 94111-1704

Re: Roots Ready Made Garments Co. W.L.L. v. The Gap, Inc., et al., C
07 3363 CRB (N.D. Cal.)

Dear Dan:

I write in response to your letter of July 31, 2007 asking to meet and confer relating to scheduling motion practice and discovery. We address below the major elements of the schedule. We welcome your input as well. If you believe any of these proposals are problematic, please let me know and we will discuss them further.

1. Gap's motion to dismiss. This is your motion, so please propose a schedule. Gap's answer or motion is now due August 16, 2007, by our calculations.

2. Initial disclosures. We propose that Gap and Roots file their initial disclosures on or before Friday, August 17.

3. Written discovery. We propose that the parties serve any interrogatories on or before September 15, 2007, and that responses be due by October 15, 2007.

4. Depositions. We propose the following schedule for depositions:

Week of September 10	<ul style="list-style-type: none">Roots is prepared to make Skeikh Faisal Al Thani, Ashraf Abu Issa, Naser Beheiry, and/or Kifah Balawi available for depositions in Paris. If these cannot all be finished, we will find a week in October to resume.
Week of September 17	<ul style="list-style-type: none">Depositions of Francois Larsen and Alain Moreaux.

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Week of September 24	<ul style="list-style-type: none">• Follow-up depositions of Ron Young and Jon Ehlen, if necessary.• Deposition of Gabana co-owner Jack Caprice.
Week of October 15	<ul style="list-style-type: none">• Any additional depositions.

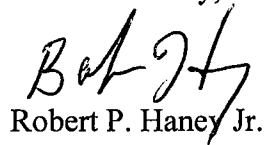
David Reilly, Ziad Al Turki and Ehab Al Shariff are not within Roots control. Roots will consult with Ziad Al Turki and Ehab Al Shariff to see if they will appear voluntarily.

5. Expert discovery. The parties can complete their expert discovery by October 30, 2007.

6. Stipulation. We would agree to a form of the stipulation attached to your letter, which would give the parties flexibility to identify witnesses for depositions on a rolling basis. There is a date of June 30, 2007 for identification of trial witnesses, which would have to be revised since it is already past. Otherwise, the stipulation is fine.

We are happy to set up a telephone call to discuss these matters, if necessary.

Yours sincerely,


Robert P. Haney Jr.

cc: Richard Jones, Esq.

Marty Glick, Esq.